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Attorney for Debtor, Karen Lambert

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

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|------------------|---|--------------------------------|
| In the Matter of | : | Chapter 13 |
| | : | |
| | : | |
| Karen Lambert | : | |
| Debtor | : | BANKRUPTCY CASE #18-21262/MBK |
| | : | |
| | : | CERTIFICATION IN OPPOSITION TO |
| | : | TRUSTEE CERTIFICATION OF |
| | : | DEFAULT |
| | : | |

1. I, Karen Lambert, am the debtor in the above-captioned matter and as such am fully familiar with the facts and circumstances therein.

2. On January 8, 2019 I entered a consent order to resolve a pending motion for relief which had been filed by The Phelan law firm on behalf of Ditech. Part of the order provided that some of the post-petition mortgage arrears would be paid through the chapter 13 plan.

3. Subsequently, I received a loan modification from Ditech which was approved by the court.

4. On October 25, 2019, an amended proof of claim was filed on behalf of Ditech indicating arrears of \$0.00.

5. On January 10, 2020 the Ditech claim was transferred to New Residential Mortgage. A transfer of claim was filed by the RAS firm.

6. On December 30, 2019, the trustee filed the withing motion to dismiss as the original

consent order remains on the docket with the post petition arrears being paid through the plan despite the fact that the amended proof of claim now indicates arrears of \$0.00.

7. My attorney has prepared an amended consent order which removes any pre petition arrears from being paid through the chapter 13 plan. However, the Phelan firm no longer represents the current mortgage holder which is now New Residential.

8. In addition, the RAS firm does not represent the current mortgage holder, New Residential, with regard to the prior motion for relief. Consequently, we are unable to resolve the issue of the old consent order still being on record.

WHEREFORE, it is respectfully requested that the certification of default be denied.

I certify under penalty of perjury that the foregoing is true and correct.

/s/ Karen Lambert
Karen Lambert

01/22/20